



September 11, 2020

Heather Casillas  
Bureau of Reclamation  
BDO-300, 801 I Street, Suite 140  
Sacramento, CA 95814  
E-mail [hcasillas@usbr.gov](mailto:hcasillas@usbr.gov)

**Re: Comments on CVPIA Accounting Guidelines and Policies**

Dear Ms. Casillas,

On behalf of Defenders of Wildlife, Ducks Unlimited, Audubon California, The Nature Conservancy, Point Blue Conservation Science, and California Waterfowl Association, we are writing to express our serious concerns with the U.S. Bureau of Reclamation's ("Reclamation") proposed revisions to the Central Valley Project Improvement Act ("CVPIA") 1993 Interim Guidelines governing CVPIA accounting requirements and 2003 Guidelines for CVPIA Program Accounting and Cost Recovery. The proposed changes could substantially reduce available funding for critical environmental programs supported by the CVPIA Restoration Fund and place additional burdens on the federal treasury. Rather than rushing ahead, Reclamation should withdraw the current proposals and work with stakeholders to craft a new plan that safeguards the CVPIA Restoration Fund and the important conservation programs it supports.

Reclamation forecasts that the CVPIA Restoration Fund is likely to see an average reduction of \$10 million annually. This is deeply concerning because the Restoration Fund is an essential funding source for Reclamation's Refuge Water Supply Program, which provides water to support millions of migratory birds on wildlife refuges in California's Central Valley. The proposed revisions lack any language to make clear that this essential program will continue to be funded as a top priority. The Restoration Fund already falls far short of the funding levels envisioned by the CVPIA and has not been sufficient to meet the wildlife refuges' water needs. In light of these shortfalls, Reclamation should be making every effort to increase collections into the Restoration Fund. Yet these proposals would exacerbate funding shortfalls, create substantial uncertainty, and make it even more difficult to provide sufficient habitat to support the shorebirds and waterfowl that migrate through the Central Valley each year.

Grassland Water District and the Golden State Salmon Association have submitted detailed comments regarding Reclamation's proposals highlighting flaws and unanswered questions. We incorporate those comments here, as we share many of the same concerns. Among other problems, we are particularly concerned about Reclamation's proposals to reclassify reimbursable expenses as partially non-reimbursable, to utilize a two-year lag time to establish power contractors' contributions, and to not quickly reassess ability-to-pay waivers. We are also concerned about Reclamation's failure to analyze the environmental impacts of its new proposals because the impacts to migratory birds, anadromous fish, and other species are likely to be profound.

In light of the many unanswered questions and troubling outcomes expected from the proposed revisions to the 1993 Interim Guidelines governing CVPIA accounting requirements and 2003 Guidelines for CVPIA Program Accounting and Cost Recovery, we request that Reclamation withdraw its proposals and work with our organizations and others to craft a plan that safeguards the CVPIA Restoration Fund, works towards achievement of the CVPIA federal mandate, and supports all of the CVPIA's important conservation programs.

Sincerely,



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Rachel Zwillinger  
Defenders of Wildlife



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Mike Lynes  
Audubon California



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Gary Link  
Ducks Unlimited



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Jeanne Brantigan  
The Nature Conservancy



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Jeff Volberg  
California Waterfowl  
Association



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Catherine Hickey  
Point Blue Conservation Science